

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JONATHAN MONSARRAT,)	CIVIL ACTION NO. 1:17-cv-10356-PBS
Plaintiff,)	
v.)	NOTICE OF FILING OF PROPOSED
BRIAN ZAIGER,)	SCHEDULING ORDER
Defendant.)	

NOW COME Defendant/Plaintiff-in-Counterclaim Brian Zaiger and Plaintiff/Defendant-in-Counterclaim Jonathan Monsarrat, by and through undersigned counsel, and, pursuant to the Court's Order of December 21, 2017 (Docket No. 79), hereby file their proposed scheduling order, attached hereto.

Pursuant to the schedule set at the Scheduling Conference (Docket No. 39), the current deadlines are:

- Discovery Closes: January 12, 2018
- Motions for Summary Judgment: February 12, 2018
- Oppositions Due: February 26, 2018
- Summary Judgment Hearing: March 22, 2018, 2:30 p.m.

Based on outstanding discovery and deposition scheduling, the parties recommend setting a deadline to amend the pleadings and extending the schedule by ninety days, to wit:

- Amendment : January 18, 2018 [Plaintiff's position] or March 13, 2018 [Defendant's position]
- Discovery Closes: April 12, 2018
- Motions for Summary Judgment: May 14, 2018
- Oppositions Due: May 28, 2018

- Summary Judgment Hearing: June 20, 2018, 2:30 p.m., or as is otherwise convenient for the Court

WHEREFORE the parties respectfully request this Honorable Court enter the accompanying scheduling order.

Dated: January 4, 2018.

Respectfully submitted,

/s/ Marc J. Randazza

Marc J. Randazza (BBO# 651477)
RANDAZZA LEGAL GROUP, PLLC
P.O. Box 5516
Gloucester, Massachusetts 01930
Tel: (702) 420-2001
Email: ecf@randazza.com

Jay M. Wolman (BBO# 666053)
RANDAZZA LEGAL GROUP, PLLC
100 Pearl Street, 14th Floor
Hartford, Connecticut 06103
Tel: (702) 420-2001
Email: ecf@randazza.com

*Attorneys for Defendant
Brian Zaiger*

Dated: January 4, 2018.

Respectfully submitted,

/s/ Richard A. Goren

Richard A. Goren, Esq.
BBO #203700
Law Office of Richard Goren
One State Street, Suite 1500
Boston, MA 02109
617-933-9494
rgoren@richardgorenlaw.com

*Attorney for Plaintiff
Jonathan Monsarrat*